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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

JACK FRANCIS NEWMAN,

Defendant.

Case No.: 2:95-cr-00066-APG-NA-1
2:95-cr-00275-APG-LRL-1
2:97-cr-00095-APG-RJJ-2

**STIPULATION TO EXTEND
GOVERNMENT'S RESPONSE
DEADLINE TO DEFENDANT'S
MOTION TO DISMISS**

ORDER

IT IS HEREBY STIPULATED AND AGREED, by and between Nicholas A. Trutanich, United States Attorney, and Shaheen Torgoley, Assistant United States Attorney, counsel for the United States of America, and Rene L. Valladares, Federal Public Defender, and Brian Pugh, Assistant Federal Public Defender, counsel for Jack Francis Newman, that Government's deadline to respond to Defendant's Motion to Dismiss be extended to Monday, February 10, 2020.

This Stipulation is entered into for the following reasons:

1. The hearing regarding revocation is presently scheduled for March 4, 2020.
2. Mr. Newman is presently out of custody.
3. An uncommon posture brings three corresponding petitions to revoke before the Court. Specifically, the underlying petitions to revoke Mr. Newman's supervised release arose

1 in 2004 and 2005. Mr. Newman was arrested in October 2019 in California, over 15 years after
2 the initial petition to revoke in July 2004.

3 4. Through defense counsel, Mr. Newman filed a motion to dismiss all three
4 petitions on December 30, 2019. Undersigned counsel for the government had minimal
5 availability to address the issues raised.

6 5. Undersigned counsel for the government now requests additional time to research
7 and respond to the motion, while also discussing a potential resolution with US Probation and
8 Mr. Newman's counsel.

9 6. Mr. Newman, through his counsel, does not oppose the government's request for
10 an extension of four weeks to respond.

11 This is the first request for an extension to respond to Defendant's Motion to Dismiss.

12 DATED: January 13, 2020

13 Respectfully submitted,

14 RENE L. VALLADARES
15 Federal Public Defender

16 */s/ Brian Pugh*

17 _____
BRIAN PUGH
Assistant Federal Public Defender

NICHOLAS A. TRUTANICH
United States Attorney

/s/ Shaheen Torgoley

SHAHEEN TORGOLEY
Assistant United States Attorney

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3 UNITED STATES OF AMERICA,

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ORDER

8
9 IT IS THEREFORE ORDERED that the Government's deadline to respond to
10 Defendant's Motion to Dismiss be extended to Monday, February 10, 2020.

11 Dated: January 13, 2020.

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14 HONORABLE ANDREW P. GORDON
15 UNITED STATES DISTRICT COURT
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